

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NATIONAL ELECTRICAL BENEFIT FUND,
by its TRUSTEES, JON F. WALTERS and
D.R. BORDEN, JR.,

Plaintiffs

vs.

C.A. No. 05-10969 NMG

UPPER CAPE ELECTRICAL, INC.,
Defendant

and

CAPE COD BANK & TRUST COMPANY,
Trustee

MOTION FOR EXTENSION OF TIME TO FILE
FOR ENTRY OF DEFAULT JUDGMENT

Plaintiffs National Electrical Benefit Fund, by its Trustees, et al, herein respectfully move this honorable Court for an extension of time until March 17, 2006 in which to file Plaintiffs' Motion for Entry of Default Judgment. As grounds therefore, Plaintiffs state as follows:

1. The parties have resolved a number of issues and are close to resolving the entirety of the above-captioned matter.
2. Judicial resources, as well as the parties' resources, will be conserved if the matter can be settled promptly and efficaciously.

WHEREFORE, Plaintiffs seek a further extension of time until March 17, 2006 in which to file for Entry of Default Judgment in this matter.

Respectfully submitted,

NATIONAL ELECTRICAL BENEFIT
FUND, by its TRUSTEES, JON F.
WALTERS and D.R. BORDEN, JR.,

By their attorneys,

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire
BBO #655207
Mary T. Sullivan, Esquire
BBO #487130
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: February 2, 2006

CERTIFICATE OF SERVICE

This is to certify that a copy of the above Motion for Extension of Time has been served by first class mail upon defendant Upper Cape Electrical, Inc. by its attorney Michael Burke at 116 Long Pond Road, Suite #9, Plymouth, MA 02360 this 2nd day of February, 2005.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire